

1. Applicant Identification  
Columbus Consolidated Government  
100 10th Street  
Columbus, GA 31901-2736
2. Funding Requested
  - a. Assessment Grant Type: Community-wide
  - b. Federal Funds Requested
    - i. \$300,000
    - ii. Not Applicable
3. Location  
a) City of Columbus b) Muscogee County c) Georgia
4. Property Information for Site-Specific Applications  
Not Applicable
5. Contacts

a. <u>Project Director</u> Robert Scott, Director of Community Reinvestment (706) 225-3918 scott.robert@columbusga.org 420 East 10th Street, 2nd Floor Columbus, Georgia 31901	b. <u>Highest Ranking Elected Official</u> B. H. "Skip" Henderson III, Mayor (706) 225-4712 SkipHenderson@columbusga.org Mayor's Office Government Center, 6th Floor 100 10th Street Columbus, Georgia 31901
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6. Population  
City of Columbus, GA: 196,670 (US Census: 2014–2018 American Community Survey)

7. Other Factors Checklist

**None of the other factors apply to this brownfield project.**

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States territory.	NA
The priority brownfield site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road or other public thoroughfare separating them.)	NA
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	NA
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	NA

8. Letter from the State or Tribal Environmental Authority

See attached

**Richard E. Dunn, Director**

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**Land Protection Branch**  
2 Martin Luther King, Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334  
404-657-8600

September 30, 2020

**VIA ELECTRONIC Mail** [Amanda.Herrit@terracon.com](mailto:Amanda.Herrit@terracon.com)>

Mr. Brian Gross, Regional Brownfield Program Contact  
US Environmental Protection Agency, Region 4  
Atlanta Federal Center  
61 Forsyth Street, S.W., 10th Fl  
Atlanta, Georgia 30303-8960

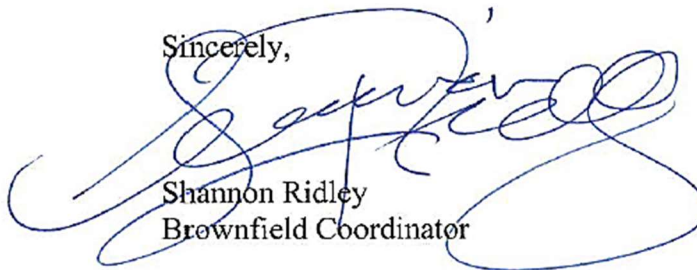
RE: State Acknowledgement Letter – Brownfield Community -Wide Assessment Grant Application  
Columbus Consolidated Government

Dear Mr. Gross:

This letter serves as acknowledgement from the Georgia Environmental Protection Division (“GA EPD”) that the Columbus Consolidated Government will be submitting an application to the U.S. Environmental Protection Agency (“EPA”) for funding assistance under the federal Community-Wide Assessment Grant Program to conduct assessment activities. GA EPD understands that the Columbus Consolidated Government is applying for \$300,000 to be used to assess brownfield properties.

EPD would like to take this opportunity to encourage EPA’s positive decision in making a grant award to the Columbus Consolidated Government for such assessment. A successful award would greatly assist this community in its redevelopment efforts. Thank you for your consideration.

Sincerely,



Shannon Ridley  
Brownfield Coordinator

File: EPA FFY 2021 Grant Applicants, Columbus Consolidated Government-Assessment

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**a. Target Area and Brownfields** i. Background and Description of Target Area: Columbus, Georgia, which encompasses approximately 218 square miles, is located on the western border of the State of Georgia and was established in 1828. As the most northern navigable point on the Chattahoochee River, the City became densely developed with manufacturing facilities. In 1970, Muscogee County and the City of Columbus were combined into one entity, the Columbus Consolidated Government (CCG), making it home to the largest southern riverfront mill district. Established in 1909, the Fort Benning Military Installation, located to the south of Columbus, provided basic training for World War I and World War II troops. As a result, the **Southside** of Columbus developed from a few commercial and residential properties north of Fort Benning to a densely developed city center with a robust industrial/rail corridor, commercial centers, and residential neighborhoods. Between the 1960s and 1990s, however, textile manufacturing was outsourced overseas. This change caused an industrial decline that left manufacturing sites as well as residential areas vacant, creating blight throughout the community.<sup>1</sup>

The target area for this application is the **Southside Railroad Corridor**, including the Southside (Census Tracts 24, 25, 27, 28, 29.02, 30, 32, and 33) and portions of MidTown (Census Tracts 18, 24, and 28). The target area is located within multiple federally designated **Opportunity Zones** (CT 18/25/27/28/29.02/30/32). The Southside, located to the north of Fort Benning, served as a community support area during the military base buildup for WWII and the Vietnam War. The **Winterfield** area, located within Southside and directly north of Fort Benning, functioned as the area's city center. Winterfield was once a vibrant and bustling area of commerce and social activity. At the northern portion of the target area, the neighborhoods of **Avondale** and **Radcliff** became home in the 1940s to the first African American subdivisions in the area providing a thriving quality of life for the residents. The **Southside** is now known as having not only one of the highest concentrations of **African American** residents but also **the highest levels of poverty, blighted properties, and crime** in Columbus. A substantial portion of the target area is located in the **floodplain of Weracoba Creek and Bull Creek and is subject to periodic flooding**, which has significantly contributed to further decline of this area.

ii. Description of the Priority Brownfield Site(s) The **Southside Rail Corridor** was once an area of productive industry and vibrant residential life but is now plagued with blighted properties including abandoned warehouses, large auto salvage yards, and derelict trailer parks. **The City has acquired 188 sites within the target area, on which 136 properties are vacant.** The City will work diligently with the target-area residents to identify and prioritize brownfield sites through a grant-funded site inventory. The CCG and target-area residents have identified two priority sites within the Southside Railroad Corridor. **Southside Industrial Park:** The Norfolk Southern Railroad owns approximately 63 acres of industrial property located in the northern part of the Southside Railroad Corridor and south of Martin Luther King, Jr (MLK) Blvd. The CCG is working with the site owner to gain access. The site contains several storage yards, dumping areas, remnant building pads, and neglected structures overgrown with vegetation. The property is currently leased to a recycling facility, which operates out of one warehouse on the northeast portion of the site. An industrial property since the 1940s, the facility was previously used as a storage yard for the railroad and most recently as a precast concrete manufacturer, which had periodic leaks from equipment, degreasers, and petroleum products at the site. **The CCG envisions redevelopment of this site into a light industrial facility or business park that would have direct access to a railroad corridor.**

<sup>1</sup> John S. Lupold, "Columbus, GA," [Georgiaencyclopedia.org/articles/Columbus](http://Georgiaencyclopedia.org/articles/Columbus), March 30, 2004, edited July 17, 2018.

**Winterfield Commercial Center:** The CCG owns approximately 3 acres at the Winterfield intersection located in the central portion of the Southside Railroad Corridor. Winterfield once served as a thriving city center for the Southside community. The property, now owned by the City, was once the location of the Majestic Night Club. The club was infamous for frequent drug activity and fatal shootings. The City ultimately shut down the club and purchased the property in the interest of public safety. The site consists of five parcels and three structures that previously operated as a nightclub, a car wash and auto repair facility, and a restaurant. After purchasing the property, the City demolished all structures. The Majestic building was formerly used as a paint store in the 1950s and 1960s. Environmental concerns on the site include dumping; periodic leaks and drips from paint, paint thinners and other solvents, pigments, resin, and additives; lead-based paint; and inground lifts and underground storage tanks for the auto repair facility and salvage yard. This site is located adjacent to three historical dry cleaners (solvent contamination: trichloroethylene, perchloroethylene, carbon tetrachloride, and mineral spirits) and two service stations (contamination from petroleum products, solvents, and degreasers such as benzene, toluene, ethylbenzene, xylenes, lead, naphthalene, and MTBE). **The City envisions the redevelopment of this commercial block back to its former glory as a commercial and social center for the benefit of the sensitive populations of the target area.**

**b. Revitalization of the Target Area** i. Reuse Strategy and Alignment with Revitalization Plans: Three target area redevelopment plans were completed with public input to address the City's need to remove blight and increase tax revenues to support the local economy. The **2015 Benning Park Redevelopment Plan** promotes economic opportunity and addresses the extreme blight and poverty of this area. The redevelopment plan identifies the following issues for this area: aging structures (the majority of commercial/industrial buildings are 50 years old or older), low property appraisal value, low property tax value, and perpetual disinvestment and underutilization of properties. The priority sites are located within the Benning Park Redevelopment Area. As the property owner, the City has access to the Winterfield Commercial Center. The City is in communication with the Norfolk Southern Railroad for site access to the Southside Industrial Park. The City envisions **Southside Industrial Park** as a light industrial facility or business park. Since it is adjacent to the **Winterfield** residential neighborhood, which has high unemployment rates, this redevelopment use would benefit the available workforce base located within walking distance. For **Winterfield Commercial Center**, the City plans to transform the former Majestic building location into a community outreach or health center, a neighborhood police station, or a fresh food market. The auto repair/carwash and restaurant properties are planned as zero lot line commercial store fronts to promote a more walkable connection to the street and a pedestrian friendly community. This site is bordered by a high poverty, residential neighborhood with **sensitive populations** that would benefit from basic resources located within walking distance. The assessment of priority sites within the Benning Park Redevelopment Area aligns with the strategic vision for this area. The Brownfield site assessments will serve as a critical link to bring underutilized properties back into productive use, thereby increasing property values and associated tax revenues for the City.

The **2015 River District Redevelopment Plan** identifies the main land-use goals for the target area as infrastructure improvements, infill development, redeveloping commercial and mixed-use nodes, and creating a walkable community with pedestrian/bike friendly improvements. The South River District, once home to a thriving African American neighborhood, serves as a critical neighborhood link between the Columbus Downtown area and other Southside neighborhoods. EPA grant-funded assessments within this neighborhood will encourage investors and developers

to invest in this area and increase tax revenues, which will meet the land-use goals of the City, the River District Redevelopment Plan, and the goals for the target area.

The **2016 MidTown Redevelopment Plan** was developed to encourage redevelopment of the **East Highlands**, a poverty-stricken neighborhood with high crime rates, as well as its industrial/commercial area located along the railroad corridor. With few greenfield sites in this area, redevelopment will be necessary to improve blighted properties, increase property values, and improve tax incomes for the City. Goals of this plan include redeveloping industrial/commercial corridors and encouraging denser land use by utilizing infill properties and mixed-use development strategies. By assessing the historical industrial/commercial corridors in this area, grant funding will provide the guidance necessary to determine which sites may be ready for redevelopment and which may require additional assessments. The use of brownfield funding in this area will align with the land-use goals of the City, the MidTown Redevelopment Plan, and the goals for the target area.

ii. Outcomes and Benefits of Reuse Strategy: With over 100 potential brownfield properties identified within the target area, environmental assessments conducted under the brownfield grant funding are necessary to stimulate economic development. As described in the redevelopment plans, the target area is an underutilized area that is primed for economic redevelopment. This area has the existing infrastructure including railroad and roads and a location necessary to re-establish itself as a prosperous live-work neighborhood. The proposed redevelopment of the **Southside Industrial Park strategically located along the Norfolk Railroad main line** as a light industrial business park would bring jobs, raise property values, and increase property and income taxes to an area with high poverty and unemployment rates while having direct access to the existing railroad and road system to transport goods to services to this area (economic benefit). The redevelopment of the **Winterfield Commercial Center** would include store fronts with access to a community health center, fresh food market, and/or local police station (non-economic benefit). The target area is located within multiple federally designated **Opportunity Zones** (CT 18/25/27/28/29.02/30/32). In addition, the **Georgia Department of Community Affairs (DCA) Opportunity Zones** located within the target area provide job tax credits for employers who create jobs within the designated high poverty areas. This tax credit will promote additional jobs as a result of redeveloped brownfields in the target area. **Existing building reuse will be preferred and encouraged as part of proposed redevelopment plans.** In addition, developers are encouraged to use energy efficient sources as part of their redevelopment strategy.

c. **Strategy for Leveraging Resources** i. Resources Needed for Site Reuse: The CCG as a local unit of government is eligible to pursue private, state, and federal grant options to further redevelopment efforts. The target area has three designated Tax Allocation Districts (TAD), Benning Park TAD, River District TAD, and MidTown West TAD. The tax allocation funding will support infrastructure improvements, environmental assessments, and demolition, when necessary, to offset cost and encourage investment in this area. TAD funding will further this endeavor by focusing infrastructure improvements on infill development, redeveloping commercial and mixed-use nodes, and creating a walkable community with pedestrian/bike friendly improvements and, therefore, re-establishing neighborhood connectivity. The CCG has committed funds for the demolition of blighted structures within the target area and will continue to do so as sites are assessed and remediated for this brownfield project. The CCG has purchased multiple properties for redevelopment as part the **Community Development Block Grant (CDBG)** within the target area. The CDBG funds may also be used to demolish buildings or conduct environmental assessments, as necessary, during site redevelopment. The majority of the



target area is located within **Opportunity Zones** (CT 18/25/27/28/29.02/30/32), which provides tax incentives for developers to invest and support redevelopment. If brownfield properties are enrolled in the GA EPD-Brownfield Program, eligible brownfield expenses may be recouped through tax abatement. The City may use these tax incentives to attract potential investors to properties that have been assessed with grant funding.

ii. Use of Existing Infrastructure Following the assessment of potential brownfield properties within the target area, the redevelopment strategy envisioned for the area will use existing infrastructure that includes the railroad, major street arteries, and I-185. The CCG has allocated funding for infrastructure improvements for the Southside community, including bridges, interchanges, multi-use trails, and streetscapes. This investment, the majority from federal grants, will have a significant impact on the redevelopment efforts.

## 2. **COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

a. **Community Need** i. The Community's Need for Funding: The target area is located within the area of greatest need for the City. The **Southside Railroad Corridor** is historically an economically depressed area with one of the highest concentrations of minority populations in the City. The target area has experienced significant economic decline since the 1970s and will need a partnership of public/private investment to make a positive, long-term impact to its residents. The **Southside Railroad Corridor** has an average **poverty rate of 49% (CT 18/24/25/27/28/29.02/30/32/33) with 67% of children living in poverty, and the median household income is \$18,570 with unemployment at 22%.<sup>2</sup>** These levels are significantly higher than the US and Georgia rates by several multiples: poverty rate 11% (US), 14% (GA); children living in poverty 16% (US), 18% (GA); median household income \$60,293 (US), \$55,679 (GA);<sup>2</sup> and unemployment July 2020 10% (US), June 2020 8% (GA).<sup>3</sup> Many properties within the target area are vacant or abandoned, creating a source of blight for the community and an opportunity for squatters, vandals, and unwanted illegal activity. Further exacerbating this situation, the condition of this area encourages disinvestment and limits the ability of the CCG to attract funding for cleanup and redevelopment. **The CCG lacks available funding for environmental assessments in the magnitude that would be necessary to redevelop this high poverty, minority community.** The CCG enacted a residential tax freeze in 1983 that has severely limited the CCG's available funding resources and placed a handicap on the CCG's future redevelopment efforts. EPA Funding will be required to bring abandoned brownfield properties back into productive use as seen in the heyday of the 1940s–1960s. The EPA Brownfield Assessment Grant will serve as a critical link to break the cycle of generational poverty and high crime rates found in the **Southside target area** and will ultimately bring back a sense of community.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: **The sensitive populations living in the target area are minorities, largely African American (average of 85% for the target area, GA 32%, US 13%), female head of household (68%, GA 39%, US 38%) and children living in poverty (67%, GA 18%, US 16%).<sup>2</sup>** These sensitive populations are living in a community where their welfare is jeopardized daily by high levels of blight and abandoned properties, crime, and poverty **(49% of the target area enrolled in gov't food assistance)**, and their ability to improve their situation is made more difficult by limited job opportunities **(unemployment 22%)** and by living in a **USDA Food Desert.<sup>4</sup>** The Southside Railroad Corridor was developed in the late 1800s and early 1900s with the majority of industry placed along the railroad corridor. During war times, Fort Benning supported the buildup of the

<sup>2</sup> US Census: 2014–2018 American Community Survey.

<sup>3</sup> US Department of Labor—Bureau of Labor Statistics. Unemployment Rate, July 2020 Federal, June 2020 State, accessed August 2020.

<sup>4</sup> US Census: 2014–2018 American Community Survey.

community and economy. After World War II and military downsizing, many businesses closed, resulting in a continuous economic decline that became most pronounced in the 1970s and 1980s. According to the 1984 Cusseta Road Area Report, the neighborhood, including the priority sites, **lost 59% of its population between 1960 and 1980**. The population shift was a result of military-personnel relocation and an urban renewal project that demolished approximately 900 housing units. This Report documented that commercial properties located in this area were the most blighted in the City with abandoned buildings, unfenced junk yards, and gross neglect of properties. The conditions remained in place as African Americans continued to relocate to this area due to available low-income housing, and by 1980 they accounted for 81% of its population. This change was most pronounced in Census Tract 30, a location of priority sites, where the percentage of **African Americans increased from 8% in 1970 to 69% in 1980 and to 85% in 2018**.<sup>4</sup> Families living at the poverty level and their children were most affected by the declining economic conditions (**per capita average income \$12,310**).<sup>4</sup> The average unemployment rate for the target area is 22%<sup>4</sup> compared to the July 2020 US rate of 10 and GA rate of 8%.<sup>5</sup> Historically, there has been a concentration of poverty (41% in 2000, 39% in 2010, 51% in 2017).<sup>4</sup> With a large transient population (housing averages 78% renter-occupied units), the opportunity for criminal activity increases, as is commonly associated with areas of high unemployment, extreme poverty, and blight.<sup>4</sup> Abandoned structures attract individuals, including children and teens, to explore the area, presenting health and safety concerns due the potential exposure to contaminants, the poor condition of structures and an abundance of crime. **The violent crime rate is 1,218 crimes per 100,000 people** compared to the US median of 341 crimes per 100,000 people.<sup>6</sup> The City experienced a reduction in crime for the first three quarters of 2019, but overall, crime in the target area has increased. **The target area represents 3% of the City's total land area, but it has 38% of the City's major crimes with 58% of murders, 37% of rapes, and 63% of assaults**.<sup>6</sup> The obvious blight of vacant properties has produced an economic and social drain, resulting in gradual disinvestment. Site assessments funded by the Brownfield Program will assist the community in removing blight, promoting community revitalization, and providing opportunity for job creation.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the Health Resource and Services Administration (HRSA), the target area is a medically underserved area and a dental care and mental health professional shortage area. The Centers for Disease Control and Prevention's (CDC) Community Health Status Indicators (CHSI) found Columbus to have a higher than average mortality rate for cancer, heart disease, Alzheimer's, diabetes, and stroke and higher morbidity rates for diabetes, obesity, and cancer. The Muscogee County Health Department reports that Muscogee County has higher rates of premature death for heart disease (target area 21%, GA 16%) and chronic lower respiratory diseases (5.8%, GA 5.7%). Muscogee County also has higher rates of complications in pregnancy and childbirth (13.4%, GA 13.1%). The Health Department has noted the following associated health factors for Muscogee County: 12% of the population has limited access to healthy food, 21% is threatened by food insecurity, 20% of adults are smokers, and 30% of adults are obese. According to the USDA Food Access Atlas, the majority of the target area has limited access to food. The National Cancer Institute reports that Muscogee County has higher rates (cases per 100,000) for the following cancers: Non-Hodgkin lymphoma (County 20, GA 18, US 19), liver (County 11, GA 8, US 8), colon/rectum (County 47, GA 42, US 39), leukemia (County 15, GA 15, US 14), lung (County 66, GA 64, US 59). **These figures are troubling considering the cancer-causing contaminants at the priority**

<sup>5</sup> US Department of Labor-Bureau of Labor Statistics. Unemployment Rate, July 2020 Federal, June 2020 State, Accessed August 2020.

<sup>6</sup> CCG Police Department 2019 Data.



**sites.** Non-Hodgkin lymphoma and liver cancers are associated with trichloroethylene—a primary contaminant from dry cleaners, which are located adjacent to the priority sites—as well as degreasers, which are associated with the **Winterfield Commercial Center** priority site. Colon/rectum cancers are associated with asbestos (respiratory hazard index GA/US: 99<sup>th</sup>/95<sup>th</sup> percentile),<sup>7</sup> associated with structures on the **Southside Industrial Park** priority site. Leukemia is associated with benzene, which is a common petroleum contaminant found at both priority sites. Lung and digestive cancers are associated with coal tar, a common contaminant from railroad ties found at the **Southside Industrial Park** priority site.<sup>8</sup> Without the EPA Brownfield grant funding of site assessments, the CCG will be unable to identify potential contaminants throughout the target area that can exacerbate underlying health conditions. By identifying these contaminants, the CCG Brownfield Program is ensuring a safe future, making way for redevelopment of the target area.

(3) **Disproportionately Impacted Populations:** As shown by the demographics of this community (**minorities: African Americans 85%, children living in poverty 67% and female heads of household 68%**), **sensitive populations** are more likely to be affected by the contaminants found within the target area and at the priority sites.<sup>9</sup> Based on a review of historical activities at the priority sites, potential contaminants in soil and groundwater may include asbestos, lead-based paint, heavy metals (including arsenic and lead), solvents (trichloroethylene, perchloroethylene, carbon tetrachloride, and mineral spirits), degreasers, and petroleum products (benzene, toluene, ethylbenzene, xylenes, lead, naphthalene, and MTBE). The potential risk from soil vapor intrusion is also higher for sensitive populations, including **pregnant women and young children** living near these commercial and industrial facilities, and can lead to respiratory illnesses and birth defects. **This area is in the 90th percentile or above for air toxics cancer risk and respiratory hazard index**, which can be associated with known asbestos sources in older structures and potential soil vapor issues identified at the priority sites and other brownfield sites within the target area.<sup>7</sup> As discussed above, this area has higher rates of lung cancer and leukemia, which can be directly linked to the higher cancer and respiratory environmental justice indices. According to the New York Times Magazine article “Pollution is Killing Black Americans,”<sup>10</sup> higher rates of particulate matter (PM) and respiratory illness, as seen in this community (PM 2.5; 75<sup>th</sup>/95<sup>th</sup> percentile in GA/US),<sup>7</sup> are linked to severe complications experienced with COVID-19. This community has been heavily impacted by COVID-19 (greater than 100 cases per 100,000 people), and the CCG issued a mask mandate on August 21, 2020.<sup>11</sup> Lead-containing paint (LCP) is a possible source for sites with older structures with the lead paint indicator for the target area in the 95th percentile.<sup>7</sup> With the large concentration of older structures within the target area and the possible structures at the **Southside Industrial Park** and historical paint facility at the **Winterfield Commercial Center**, lead paint is anticipated as a contaminant. Onsite activities involving petroleum products, degreasers, and solvents can lead to the contamination of soil and groundwater (wastewater discharge indicator GA/US: 98<sup>th</sup>/96<sup>th</sup> percentile).<sup>7</sup> Sensitive populations are being exposed to contaminants present at the priority sites and other brownfield sites located within the target area. The Assessment Grant will assist the community in identifying these environmental hazards and will provide guidance to limit exposures that affect the sensitive populations.

**b. Community Engagement** i. Project Involvement & ii. Project Roles: Below are local organizations who have expressed a desire to be involved in site selection, prioritization, cleanup, and future redevelopment of the brownfield sites.

<sup>7</sup> Environmental Justice Screening Tool, Census Tracts 18, 24, 25, 27, 28, 29.02, 30, and 32; accessed August 2020.

<sup>8</sup> National Cancer Institute, [statecancerprofiles.cancer.gov.](https://statecancerprofiles.cancer.gov/), accessed August 2020.

<sup>9</sup> US Census: 2014–2018 American Community Survey.

<sup>10</sup> “Pollution is Killing Black Americans,” The New York Times Magazine, July 28, 2020.

<sup>11</sup> Executive Order 20-04. Columbus Consolidated Government. *Emergency Order Requiring that Face Coverages or Mask be Worn in Public.* August 21, 2020.

<b>Name of Org.</b>	<b>Point of Contact</b>	<b>Specific involvement in the project</b>
The Housing Authority	Laura Johnson ljohnson@columbushousing.org	Informing target-area residents of project status. Obtaining input on <b>site inventory</b> and <b>future reuse planning</b> .
Community Foundation of the Chattahoochee Valley	Betsy Covington bcovington@cfcv.com	Provide sources of local funding for <b>future redevelopment</b> and informing the target area residents of project status.
South Columbus United Methodist Church	Reggie Williams pastorreggie04@gmail.com	Providing grant status updates to the community, assisting with community outreach, and providing meeting space.
West Central Department of Public Health	Asante Hilts asante.hilts@dph.ga.gov	Assist with evaluating potential properties for assessment and <b>site prioritization</b> based on the need of the target area.

iii. **Incorporating Community Input:** The CCG has historically since 2019 and will continue to involve the community in this project through public meetings, the Columbus Brownfields Website, and social media. The CCG will also continue to promote events online on the Community Reinvestment and Brownfield websites and through social media. Comments and questions from the community will be collected and addressed through the Community Reinvestment Facebook page. The proposed target area and grant application was discussed and approved at the Columbus Council Meeting on October 12, 2020. Comments from the Brownfield Advisory Board, community, and target-area residents will be incorporated into the decision-making process for developing a priority site inventory and future reuse plans.

Due to the unprecedented impact of COVID-19 and mandated protections for public health, the CCG will host web meetings as part of the community involvement requirements. Since March 2020, the CCG has held public meetings in a virtual format. As required by the Mayor's Executive Order, face masks are required in all public places. Virtual meetings will continue until this present threat to public health is no longer a concern and the Mayor's orders expire. Virtual public meetings will be held twice a year throughout the grant period to inform and engage members of the public, with periodic updates made during regularly scheduled council meetings. Project updates and other grant project-related documents will be provided on the CCG and Columbus Brownfield websites and through email distribution lists, and copies will be made available at the Community Reinvestment office and the Columbus Public and Mildred L. Terry libraries. The target-area residents and property owners will be encouraged to join public meetings and an email distribution list, and to remain informed of the latest news of the project's progress and upcoming events through social media. Project partners will be encouraged to disseminate information locally to those without internet access, in particular to the target-area residents. Project partners committed to outreach assistance will be asked to help to publicize project progress, events, and accomplishments. The Community Involvement Plan (CIP) created during the FY2017 EPA Brownfield Assessment Grant Project and updated during the FY2019 Cleanup grant, will be updated as needed during this project.

### **3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Description of Tasks/Activities and Outputs:** The CCG is requesting a US EPA Brownfields Assessment Grant in the amount of \$300,000 for a community-wide assessment program.

<b>Task 1: Outreach</b>	
i	<i>Project Implementation:</i> The CCG Brownfield Project Manager will update the Community Involvement Plan (CIP) developed as part of the FY2017 EPA Assessment Grant, outreach materials, update brownfield project website, and social media posts with the assistance of the environmental consultant (consultant). CCG staff will lead the community meetings (online during COVID-19 and in person post

	COVID-19) to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software.
ii	<i>Anticipated Project Schedule:</i> CIP updated within 3 months of award (upon completion a more concrete schedule will follow). Community Meetings will be held in the 1 <sup>st</sup> and 3 <sup>rd</sup> quarters annually. Website and Outreach Materials will be updated in the 1 <sup>st</sup> quarter and then quarterly throughout the grant project.
iii	<i>Task/Activity Lead:</i> CCG: Kevin Garza, Brownfield Project Manager
iv	<i>Outputs:</i> Updated CIP, Updated Brownfield Website, 6 Community Meetings, Brochures/Handouts, Social Media Posts, Meeting handouts, sign-in sheets, and meeting minutes.
<b>Task 2: Site Inventory</b>	
i	<i>Project Implementation:</i> The CCG Brownfield Project Manager will work with the residents living in the target area during community meetings to create a site inventory for assessment. Abandoned and underutilized properties identified by the residents of the target area will be researched further by CCG staff using the GIS website. Once a list is compiled, the consultant will work with staff to create an evaluation ranking tool to determine, with the help of residents, the order the sites will be addressed.
ii	<i>Anticipated Project Schedule:</i> The community meeting held in 1 <sup>st</sup> quarter will continue the preliminary inventory process which began with this application with the evaluation ranking process taking place in the 3 <sup>rd</sup> quarter & continuing throughout the grant project.
iii	<i>Task/Activity Lead:</i> CCG: Kevin Garza, Brownfield Project Manager
iv	<i>Outputs:</i> Evaluation Ranking Tool, Site Inventory List
<b>Task 3: Assessment</b>	
i	<i>Project Implementation:</i> The consultant will conduct Environmental Site Assessment (ESA) activities at sites selected and ranked through the Site Inventory Task, starting first with the two priority sites listed in this application. ASTM-AAI compliant Phase Is; Generic Quality Assurance Project Plan (QAPP); Phase IIs which will include the SS-QAPP. Prior to assessment, site access agreements and property eligibility determinations approval will be obtained.
ii	<i>Anticipated Project Schedule:</i> Assessment activities will begin in the 2 <sup>nd</sup> quarter and will continue throughout the grant project.
iii	<i>Task/Activity Lead:</i> The consultant will implement the technical aspects of the project with oversight from CCG's Kevin Garza, Brownfield Project Manager.
iv	<i>Outputs:</i> 12 Phase I ESAs, 1 Generic QAPP, and 8 Phase II ESAs including SS-QAPP, Site Access Agreements and Property Eligibility Determinations.
<b>Task 4: Remediation/Reuse Planning</b>	
i	<i>Project Implementation:</i> For projects identified for cleanup, the consultant will prepare the Analysis for Brownfields Cleanup Alternatives (ABCA) and/or Cleanup Plans. Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs and determining site appropriate remediation/reuse planning to reduce health/environmental risks. The consultant will assist the CCG in hosting charrettes/visioning sessions (virtual or in person depending on COVID restrictions) for key properties.
ii	<i>Anticipated Project Schedule:</i> Plans & Charrettes to begin in the 6 <sup>th</sup> quarter and will continue throughout the grant project.
iii	<i>Task/Activity Lead:</i> The consultant will implement the technical aspects of the project with oversight from CCG's Kevin Garza, Brownfield Project Manager.
iv	<i>Outputs:</i> 4 ABCAs, 1 Vision Sessions/Charrettes
<b>Task 5: Programmatic Support</b>	
i	<i>Project Implementation:</i> The Brownfield Project Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule and terms and conditions. The consultant will assist the CCG in completing ACRES Database Reporting, Annual Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the three-year term of the grant. The CCG staff travel budget allows for two staff to attend two national/regional/grantee brownfield training conferences/workshops.

ii	<i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1 <sup>st</sup> quarter & Quarterly Reporting begins in the 2 <sup>nd</sup> quarter and continues throughout the grant project. Annual Reporting and Forms created in 5 <sup>th</sup> quarter, 9 <sup>th</sup> quarter, and during final closeout.
iii	<i>Task/Activity Lead:</i> CCG: Kevin Garza, Brownfield Project Manager
iv	<i>Outputs:</i> ACRES Database Reporting, 3 Annual Financial Reports, 12 Quarterly Reports, 3 MBE/WBE Forms, Programmatic Support for the three-year grant period. Two staff to attend two conferences.

**b. Cost Estimates:** Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks.* The budget for this project includes travel, supplies and contractual costs only. **CCG commits to spending 75% of the budget on the Assessment Activities.**

**Task 1 – Outreach:** Contractual: Community Involvement Plan \$1,500 (15hrs x \$100), Updated Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$3,000 (30hrs x \$100), 6 Community Education Meetings \$7,200 (72hrs x \$100) (\$1,200/meeting), Supplies: Software, printouts, etc. \$1,300. **Task 2 – Site Inventory:** Contractual: \$6,000 (60hrs x \$100). **Task 3 – Assessment:** Contractual: 12 Phase I ESA \$3,125 each for a total of \$37,500. 1 Generic QAPP \$4,500. 8 Phase II ESA including SS-QAPP at \$23,000 each for a total of \$184,000. **Task 4 – Remediation/Reuse Planning:** Contractual: 4 ABCAs \$6,500 each for a total of \$26,000. 1 Vision Sessions/Charrettes \$5,000 (\$5,000/meeting). **Task 5 – Programmatic Support:** Contractual: ACRES Database Reporting, Annual & Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the three-year grant period \$19,000 (190hrs x \$100). Travel: Two staff for two conferences \$5,000 (flights \$750, 3 nights hotel \$350, incidentals & per diem \$150 x 2 attendees).

Category	Tasks					Totals
	Outreach	Site Inventory	Assessment	Remediation/ Reuse Planning	Programmatic Support	
Travel					\$5,000	\$5,000
Supplies	\$1,300					\$1,300
Contractual	\$11,700	\$6,000	\$226,000	\$31,000	\$19,000	\$293,700
<b>Total Budget</b>	<b>\$13,000</b>	<b>\$6,000</b>	<b>\$226,000</b>	<b>\$31,000</b>	<b>\$24,000</b>	<b>\$300,000</b>

**c. Measuring Environmental Results:** To ensure this EPA Brownfield Project is on schedule, the CCG Brownfields Team, which will include the consultant, will meet quarterly to track all **outputs identified in 3.a** using an Excel spreadsheet and will report all progress in fulfilling the scope of work, goals, and objectives to the EPA via quarterly reports. In addition, project expenditures and activities will be compared to the projects schedule to ensure the grant project will be completed within the three year time frame. Site specific information will be entered and tracked in the ACRES database. The outputs to be tracked include the number of neighborhood meetings, public meetings, meetings with community groups and community partners, environmental assessments, ABCAs, and cleanup redevelopment plans. The outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not being achieved in an efficient manner, the CCG's has countermeasures in place to address this problem. The CCG's will make monthly calls to their EPA Project Officer and if needed will revise the existing Work Plan to help the project to get back on schedule.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability** i. Organizational Structure & ii. Description of Key Staff: Robert Scott, CCG's Director of Community Reinvestment, will serve as the Brownfields Program Director. He is responsible for the oversight and completion of administrative and financial requirements of the grant. Mr. Scott previously served as the Emergency Solutions Grant and



HOME Investment Partnerships Senior Program Manager in Gwinnet County for five years. He is responsible for managing real estate acquisitions, disposing and leasing, and overseeing the bid contracts, reviewing and underwriting proposals, and preparing reports and budgets. Kevin Garza, City Planner, has served in this position for four years and will serve as the Brownfields Project Manager and will be responsible for the management of the day-to-day activities of the brownfield project. Mr. Garza will be the primary contact and will provide technical oversight for the project. Angelica Alexander will serve as the financial director. Ms. Alexander has over 11 years of experience and provides overall direction of the Finance Department supervising accounting, purchasing, financial planning and revenue divisions. She will be responsible for completing drawdowns and financial oversight for this grant.

iii. Acquiring Additional Resources: Procurement for a qualified environmental consultant for this project will be completed in full compliance with state and federal guidelines. The CCG's RFQ process typically takes 90 days and includes the following internal steps and approvals. The sealed bid process and RFQ process will be administered by the Purchasing Department and reviewed by the issuing agency. Contracts will be sent to the selected contractors. The pre-award process for contractor selection will commence once the award notification is received with the intention of having contracts in place prior to the release of grant funds.

**b. Past Performance and Accomplishments** i. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments: The CCG was awarded an EPA Brownfield Assessment Grant in 2017 for the 2nd Avenue Corridor. The CCG completed 9 Phase I Environmental Site Assessments (ESA), 6 Limited Site Investigations (Phase II ESAs), the Generic Quality Assurance Project Plan (QAPP), 6 Site-Specific QAPPs, and cleanup planning. The outcomes of these projects were documented in the ACRES system at the time of task completion. The grant was completed and closed in February 2020. The CCG was awarded a FY2019 EPA Brownfield Cleanup Grant for the Former State Farmers Market. The site was assessed during the FY2017 Assessment Grant and found to have asbestos and lead-based paint in the buildings and petroleum contamination in soil. The CIP has been updated and approved for this grant and an online public meeting is planned for the Fall of 2020. The ABCA and SS-QAPP have been updated and will be available for public comment in October 2020. Bid documents have been drafted for the site cleanup activities. The cleanup activities will be completed, and the grant will be closed by October 2022. The CCG was awarded an EPA Brownfield Assessment Pilot Grant in 2002 for the Enterprise Zone area. The project area was comprised of approximately 1,780 acres and 12,883 parcels with 100 parcels identified as part of the brownfield site inventory. (2) Compliance with Grant Requirements: The FY17 Assessment grant was been handled properly regarding compliance with grant work plans, schedules, and terms and conditions. The required quarterly reporting and annual report have been delivered in a timely manner as well as grant deliverables entered into the ACRES Database. The FY17 Assessment grant was completed in February 2020 and all funding was expended. The FY19 Cleanup grant has completed the ABCA, and SS-QAPP with the community online meeting planned for the Fall of 2020. The bidding documents have been drafted for the FY19 Cleanup Grant. The 2002 Pilot Grant was handled properly regarding compliance with grant work plans, schedules, and terms and conditions with deliverables provided to EPA in a timely manner. All required Property Profile Forms, Annual, and Quarterly reporting and Closeout reports were delivered in a timely manner. The 2002 EPA Brownfield Pilot Grant was closed in 2005 with a remaining balance of \$1,238.95.



## Threshold Criteria

### **1. Applicant Eligibility**

Columbus Consolidated Government, Columbus, Georgia, is eligible to apply for an EPA Brownfields Assessment Grant as a local government as defined under 2 CFR § 200.64.

### **2. Community Involvement**

The Columbus Consolidated Government (CCG) has completed community involvement tasks through the FY17 EPA Brownfield Assessment Grant and FY19 EPA Brownfield Cleanup Grant. The CCG will continue to involve the community through public meetings, the Columbus Brownfields Website, and social media. The CCG first discussed this application during a Brownfield Advisory Board (BAB) training in May 2019 and continued discussions at CCG and BAB meetings throughout 2019 and 2020. The CCG will continue to promote events online on the Community Reinvestment and the Columbus Brownfield websites and through their social media accounts. Comments and questions from the community will be collected and addressed through the Community Reinvestment Facebook page. The proposed target area and FY21 Assessment Grant application was discussed, and the application submittal was approved, at the October 12, 2020, Columbus Council Meeting. Comments from the Brownfield Advisory Board (BAB) and target-area residents will be incorporated into the decision-making process for developing a priority site inventory and future reuse plans.

Due to the unprecedented impact of COVID-19 and mandated protections for public health, the CCG will host web meetings as part of the community involvement requirements. Since March 2020, the CCG has held public meetings in a virtual format. As required by the Mayor's Executive Order, face masks are required in all public places. Virtual meetings will continue until this present threat to public health is no longer a concern and the Mayor's orders expire. Virtual public meetings will be held twice a year throughout the grant period to inform and engage members of the public, and periodic updates will be made during regularly scheduled council meetings. Project updates and other grant project-related documents will be provided on the CCG and Columbus Brownfield websites and through email distribution lists, and copies will be made available at the Columbus Public Library, the Mildred L. Terry Library, and the office of Community Reinvestment. The target area residents and property owners will be encouraged to join an email distribution list and follow the project on social media to remain informed of the latest news of the project's progress and upcoming events. The CCG plans to develop virtual meetings to promote the education of the brownfield process and provide an opportunity to engage with the community. Project partners will be encouraged to disseminate information locally to those without internet access, in particular to the target-area residents. Project partners committed to outreach assistance will be asked to help publicize project progress, events, and accomplishments. The Community Involvement Plan (CIP), updated during the FY2019 EPA Brownfield Cleanup Grant Project will be updated as needed for this project and made available to the public on the CCG's website.

### **3. Expenditure of Assessment Grant Funds**

The CCG affirms that they do not have an active EPA Brownfields Assessment Grant. The FY17 EPA Assessment Grant was closed out in February 2020 when all funds were expended, and the Grant Closeout Report was approved by the EPA Project Officer.

## **Compliance Statement**

The City of Columbus/Community Reinvestment assures that no person shall on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance. Community Reinvestment further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

## **For Additional Information or to File a Complaint**

For additional information about the Community Reinvestment non-discrimination obligations under Title VI, or to file a Title VI Discrimination Complaint, please contact any of the following:

- Community Reinvestment Customer Service, 706-225-4613
  - Affirmative Action/Equal Employment Opportunity Office, 706-653-4017
  - Community Reinvestment, P. O. Box 1340, Columbus, Georgia 31902
  - Website: [www.columbusga.gov/communityreinvestment](http://www.columbusga.gov/communityreinvestment)
  - Federal contact information for filing a complaint
- 

The Community Reinvestment is an Equal Opportunity Employer and complies with the Civil Rights Act of 1964. If you believe you have been discriminated against in any program, activity, or service provided by the Community Reinvestment, a recipient of federal assistance, you should contact:

- Community Reinvestment Customer Service, 706-225-4613
  - Affirmative Action/Equal Employment Opportunity Office, 706-653-4017
  - Community Reinvestment, P. O. Box 1340, Columbus, Georgia 31902
  - Website: [www.columbusga.gov/communityreinvestment](http://www.columbusga.gov/communityreinvestment)
  - Federal contact information for filing a complaint
- 

The City of Columbus/Community Reinvestment assures that no person shall on the grounds of race, color, national origin, sex, age or disability as provided by Title VI of the Civil Rights Act of 1964 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

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If you believe you have been discriminated against and wish to file a complaint, please use the resources provided below:

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- Affirmative Action/Equal Employment Opportunity Office, 706-653-4017
- Community Reinvestment, P. O. Box 1340, Columbus, Georgia 31902

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- Federal contact information for filing a complaint

**Compliance Statement**

Regulations of the U.S. Department of Justice strictly prohibit unlawful discrimination in the City of Columbus/Community Reinvestment Federally Assisted Programs on the basis of race, color, or national origin. Any person who believes he or she has been discriminated against in any program, activity, or facility operated by recipient of Federal assistance should contact:

- Community Reinvestment Customer Service, 706-225-4613
- Affirmative Action/Equal Employment Opportunity Office, 706-653-4017
- Community Reinvestment, P. O. Box 1340, Columbus, Georgia 31902
- Website: [www.columbusga.gov/communityreinvestment](http://www.columbusga.gov/communityreinvestment)
- Federal contact information for filing a complaint

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

10/16/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

BF

### State Use Only:

6. Date Received by State:

7. State Application Identifier:

### 8. APPLICANT INFORMATION:

\* a. Legal Name:

Columbus Consolidated Government

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

58-1097948

\* c. Organizational DUNS:

1392022170000

### d. Address:

\* Street1:

100 10th Street

Street2:

\* City:

Columbus

County/Parish:

Muscogee

\* State:

GA: Georgia

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

31901-2736

### e. Organizational Unit:

Department Name:

Community Reinvestment

Division Name:

### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

\* First Name:

Kevin

Middle Name:

\* Last Name:

Garza

Suffix:

Title:

Planner

Organizational Affiliation:

\* Telephone Number:

(706) 225-3929

Fax Number:

(706) 225-4513

\* Email:

KGarza@columbusga.org

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-20-06

\* Title:

FY21 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

FY21 Columbus Consolidated Governments Assessment Grant Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

2, 3

\* b. Program/Project

2, 3

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

10/01/2021

\* b. End Date:

09/30/2024

**18. Estimated Funding (\$):**

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number: Fax Number: \* Email: \* Signature of Authorized Representative: \* Date Signed: